

Hearing Date and Time: December 6, 2011 at 10:00 a.m. (Prevailing Eastern Time)
Objection Date and Time: November 10, 2011

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

Chapter 11 Case No.

08-13555 (JMP)

(Jointly Administered)

**JOINDER OF BNY MELLON CORPORATE TRUSTEE SERVICES LIMITED IN
RESPONSE AND RESERVATION OF RIGHTS OF ETHIAS SA WITH RESPECT TO
NOTICES OF PROPOSED ASSUMPTION OF EXECUTORY CONTRACTS AND
UNEXPIRED LEASES PURSUANT TO DEBTORS' THIRD AMENDED JOINT
CHAPTER 11 PLAN PURSUANT TO SECTION 1121 OF THE BANKRUPTCY CODE**

BNY Mellon Corporate Trustee Services Limited ("BNYM"), by its undersigned counsel,
hereby files this Joinder of BNY Mellon Corporate Trustee Services Limited in Response and
Reservation of Rights of Ethias SA with Respect to Notices of Proposed Assumption of
Executory Contracts and Unexpired Leases Pursuant to Debtors' Third Amended Joint Chapter
11 Plan Pursuant to Section 1121 of the Bankruptcy Code, and states as follows:

1. BNYM is successor trustee under a certain Principal Trust Deed, dated 10
October 2002, between Dante Finance Public Limited Company and J.P. Morgan Corporate
Trustee Services Limited (as amended and restated, the "Principal Trust Deed") and certain

Supplemental Trust Deeds entered into in accordance with the Principal Trust Deed (collectively, the "Trust Deed"), including those referenced specifically in the Ethias Response (as defined below).¹

2. On or about November 9, 2011, Ethias SA submitted its response and reservation of rights (the "Ethias Response") [Docket No. 21838] with respect to the Plan Supplement [Docket No. 21254], filed on October 25, 2011, by Lehman Brothers Holdings Inc. and its affiliated debtors solely with respect to the proposed assumption of certain contracts, as described therein. As more fully set forth in the Ethias Response, Ethias SA reserves all rights, claims, defenses, and remedies in connection with the proposed assumption of the Contracts.

3. At the direction of Ethias SA, given in accordance with the Trust Deed, the Trustee joins in the Ethias Response and reserves all rights, claims, defenses, and remedies in connection with the proposed assumption of the Contracts, including, without limitation, the right to amend, modify, or supplement this Joinder, dispute the treatment of the Contracts as executory contracts, seek discovery, seek full cure and compensation pursuant to Section 365 of the Bankruptcy Code, and otherwise.

Dated: November 10, 2011
New York, New York

Respectfully submitted,

REED SMITH LLP

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¹ BNYM incorporates by reference the definitions used in the Ethias Response.